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6 Attorneys for Defendant  
Wachovia Securities, LLC,  
7 n/k/a Wells Fargo Advisors, LLC

8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10 OAKLAND DIVISION

11 GREGORY R. RAIFMAN and SUSAN  
RAIFMAN, husband and wife, individually and  
12 on behalf of their marital community and as  
Trustees of the RAIFMAN FAMILY  
13 REVOCABLE INTERVIVOS TRUST and as  
beneficiaries of the PALLADIAN TRUST;  
14 GEKKO HOLDINGS, LLC, and HELICON  
INVESTMENTS, LTD.,

15 Plaintiffs,

16 v.

17 WACHOVIA SECURITIES, LLC, N/K/A  
18 WELLS FARGO ADVISORS, LLC,

19 Defendant.

Case No. C 11-02885 SBA

**STIPULATION TO ENLARGE  
DEFENDANT'S TIME TO OPPOSE  
PLAINTIFFS' MOTION FOR LEAVE TO  
FILE PROPOSED SECOND AMENDED  
COMPLAINT**

Action Filed: April 1, 2011

[Removed from California State Court]

Hon. Sandra B. Armstrong

21 Whereas, on January 14, 2013, Plaintiffs Gregory L. Raifman and Susan Raifman, husband  
22 and wife, individually and on behalf of their marital community and as Trustees of The Raifman  
23 Family Revocable Intervivos Trust, as beneficiaries of The Palladian Trust, as sole members of  
24 Gekko Holdings, Ltd., and assignees in interest and beneficial owners of Helicon Investments, Ltd.  
25 (collectively, "Plaintiffs"), filed their motion for leave to file a proposed second amended complaint  
26 ("Motion") in this action;

28 Case No. C 11-02885 SBA

STIPULATION TO ENLARGE DEFENDANT'S TIME TO OPPOSE PLAINTIFFS' MOTION FOR LEAVE TO FILE  
PROPOSED SECOND AMENDED COMPLAINT

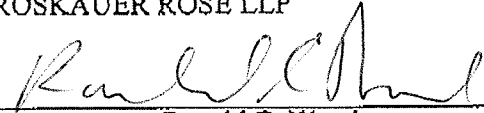
1 Whereas, Defendant Wachovia Securities, LLC's ("Defendant") opposition to the Motion is  
2 due on January 28, 2013 pursuant to Federal Rule of Civil Procedure 15(a)(3); and

3 Whereas, on January 22, 2013, the parties, by and through their respective counsel, entered a  
4 stipulation agreeing to enlarge Defendant's time to oppose until February 15, 2013;

5 NOW, THEREFORE, the parties, through their counsel, hereby stipulate and agree, pursuant  
6 to Local Rule 6-1(b), that Defendant shall have until February 15, 2013, to oppose Plaintiffs'  
7 Motion. This extension will not alter the date of any event or deadline already fixed by Court order.

8 DATED: January 24, 2013

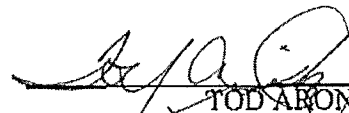
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10   
11 Ronald E. Wood

12 Attorneys for Defendant,  
13 WACHOVIA SECURITIES, LLC

14 DATED: January 24, 2013

TOD ARONOVITZ  
BARBARA PEREZ

15  
16   
TOD ARONOVITZ

17 Attorney for Plaintiffs,  
18 GREGORY R. RAIFMAN, SUSAN  
19 RAIFMAN, GEKKO HOLDINGS, LLC, and  
20 HELICON INVESTMENTS, LTD.

21  
22 PURSUANT TO STIPULATION, IT IS SO ORDERED.

23 DATED: 1/25/13

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25   
26 Hon. Sandra J. Armstrong  
27 United States District Judge  
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